UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MAR 0 8 2016

CERTIFIED MAIL #7009 1680 0000 7648 7580
RETURN RECEIPT REQUESTED

REPLY TO THE ATTENTION OF:

Mr. Paul Madden
Technical Director
Eco Finishing Company
5100 Industrial Boulevard
Fridley, Minnesota 44421

Re: Notice of Violation
Compliance Evaluation Inspection
MND985767482

Dear Mr. Madden:

On April 28, 2015, representatives of the U.S. Environmental Protection Agency and Anoka County, Minnesota, inspected the Eco Finishing Company facility located in Fridley, Minnesota (EFC). As a large quantity generator of hazardous waste, Eco is subject to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 et seq. (RCRA). The purpose of the inspection was to evaluate Eco's compliance with certain provisions of RCRA and its implementing regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by EFC, EPA's review of records pertaining to EFC, and the inspector's observations, EPA has determined that EFC has unlawfully stored hazardous waste without a permit or interim status as a result of Eco's failure to comply with certain conditions for a permit exemption under Minn. R. part 7045.0292 Subparts 1 through 11 [40 C.F.R. § 262.34(a)-(c)]. EPA has identified the permit exemption conditions with which EFC was out of compliance at the time of the inspection in paragraphs 1- 8, below.

Many of the conditions for a RCRA permit exemption are also independent requirements that apply to permitted and interim status hazardous waste management facilities that treat, store, or dispose of hazardous waste (TSD requirements).

- When a hazardous waste generator loses its permit exemption due to a failure to comply with an exemption condition incorporated from Minn. R. 7045.0552 to 0649, the generator: (a) becomes an operator of a hazardous waste storage facility; and (b) simultaneously violates the corresponding TSD requirement.

- The exemption conditions identified in paragraphs 3 through 8 are also independent TSD requirements incorporated from Minn. R. 7045. Accordingly, each failure of EFC to

comply with these conditions is also a violation of the corresponding requirement in Minn. R. 7045.0552 to 0649 [40 C.F.R. Part 265].

Finally, EPA has determined that EFC violated a RCRA used oil requirement as described in paragraph 9, below.

STORAGE OF HAZARDOUS WASTE WITHOUT A PERMIT OR INTERIM STATUS

At the time of the inspection, EFC was out of compliance with the following large quantity generator permit exemption conditions:

1. Hazardous Waste Accumulation Requirement: Under Minn. R. 7045.0292 Subpart 1, Item A [40 C.F.R. § 262.34(a) and (b)], a large quantity generator may accumulate hazardous waste on-site for 90 days or less without a permit or interim status unless the generator has been granted an extension of the 90-day period.

   At the time of the inspection, EFC maintained two 55-gallon containers with accumulation start dates that eventually exceeded 90 days: one container of waste nickel hazardous waste was located in less-than 90-day hazardous waste storage area #1 that had an accumulation start date of over 89 days which exceeded 90 days two days later; and one container in less-than 90 day hazardous waste storage area #2 of waste chrome D007 hazardous waste that had an accumulation start date of over 769 days, which exceeded 90 days. EFC was not granted an extension of the 90-day period.

2. Accumulation Start Date Requirement: Under Minn. R. 7045.0292 Subpart 1, Item C [40 C.F.R. § 262.34(a)(2)], a large quantity generator must clearly label tanks and containers with the waste accumulation start date.

   At the time of the inspection, one pail of D008 hazardous waste in the less-than 90 day hazardous waste storage area #1 was not marked with an accumulation start date. Facility personnel added the accumulation start date to the label at the time of the inspection. At the time of the inspection, one tote of F006 hazardous waste under a filter press was not marked with the accumulation start date. Facility personnel added the accumulation start date to a label, and then affixed the label to the tote at the time of the inspection.

3. Satellite Container, Closed Container Requirement: Under Minn. R. 7045.0292 Subpart 8, Item B and 7045.0626 Subpart 4 [40 C.F.R. § 262.34(c)(1)(i) and § 265.173(a)] , a generator must keep closed containers holding hazardous waste, except when it is necessary to add or remove waste.

   At the time of the inspection, EFC had at least three buckets in the basement of waste cyanide that were not closed with no workers present to add or remove waste.

4. Training Records, Contingency Plan Implementation Requirement: Under Minn. R. 7045.0292 Subpart 1, Item I and 7045.0558 Subpart 3, Item B [40 C.F.R. § 262.34(a)(4)

and § 265.16(a)(3)], a generator must have a training program that, at a minimum, includes instruction which teaches facility personnel hazardous waste management procedures relevant to the positions in which they are employed, including contingency plan implementation procedures.

At the time of the inspection, EFC representatives did not provide training documents that included contingency plan implementation procedures.

5. Training Records, Job Description Requirement: Under Minn. R. 7045.0292 Subpart 1, Item I and 7045.0558 Subpart 6, Item B [40 C.F.R. § 262.34(a)(4) and § 265.16(d)(2)] , a generator must have a written job description for each position at the facility related to hazardous waste management that includes the duties of employees assigned to each position.

   At the time of the inspection, EFC did not have job descriptions that included hazardous waste duties for the Waste Treatment Operator, Laboratory (Lab) Technician (Tech), or Technical Director.

6. Minimize the Possibility of Fire, Explosion, or Release Requirement: Under Minn. R. 7045.0292 Subpart 1, Item I and 7045.0566 Subpart 2 [40 C.F.R. § 262.34(a)(4) and § 265.31], a large quantity generator must maintain and operate facilities to minimize the possibility of fire, explosion, or any unplanned sudden or non-sudden release to air, land or water of hazardous waste or hazardous waste constituents which could threaten human health or the environment.

   At the time of the inspection, EFC had materials, both hazardous wastes and solid wastes, accumulating and potentially mixing within the wastewater treatment system containment and other secondary containment areas, and under process tanks; and chemicals solidifying in and on pipes and tanks within the process areas, which may cause EFC to accumulate hazardous wastes as opposed to allowing a flow of wastes towards the wastewater treatment system. Waste material was found on pipes, platforms, and within containment areas for the barrel zinc line, the nickel line, the small zinc line, the black oxide line, the chiller line, and the chromate line.

7. Contingency Plan, Submission to emergency response organizations: Under Minn. R. 7045.0292 Subpart 1, Item I and 7045.0572 Subpart 5, Item B [40 C.F.R. § 262.34(a)(4) and § 265.53(b)], a large quantity generator must submit copies of the contingency plan and all revisions to local police departments, fire departments, hospitals, and state and local emergency response teams that may be called upon to provide emergency services.

   At the time of the inspection, EFC was unable to provide any documentation showing submission of attempts to submit its contingency plan to emergency response organizations.

8. Contingency Plan, Update Requirement: Under Minn. R. 7045.0292 Subpart 1, Item I and 7045.0572 Subpart 6, Item C [40 C.F.R. § 262.34(a)(4) and § 265.54(c)], a large

quantity generator must amend the contingency plan the changes the response necessary in an emergency.

At the time of the inspection, EFC had not amended its contingency plan to reflect the changes in emergency response team members.

Used Oil

9. Used Oil Requirement: Under Minn. R. 7045.0855 Subpart 2, Item C [40 C.F.R. § 279.22(c)(1)(i)], containers, aboveground tanks and fill pipes of underground tanks used to store used oil at generator sites must be marked with the words "Used Oil."

   At the time of the inspection, EFC stored one 5-gallon container near the zinc automatic line of used oil that was not marked or labeled with the words, "Used Oil." At the time of the inspection, EFC stored one 55-gallon container near the zinc automatic line was marked with the words, "Oil waste" as opposed to the words, "Used Oil."

At this time, EPA is not requiring EFC to apply for an Illinois hazardous waste storage permit so long as it immediately establishes compliance with the conditions for a permit exemption and the used oil requirement outlined in paragraphs 1 - 9, above.

According to Section 3008(a) of RCRA, EPA may issue an order assessing a civil penalty for any past or current violation, requiring compliance immediately or within a specified time period, or both. Although this letter is not such an order or a request for information under Section 3007 of RCRA, 42 U.S.C. § 6927, we request that you submit a response in writing to us no later than 30 days after receipt of this letter documenting the actions, if any, which you have taken since the inspection to establish compliance with the above conditions and used oil requirement. You should submit your response to Daniel Chachakis, U.S. EPA, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

If you have any questions regarding this letter, please contact Mr. Daniel Chachakis, of my staff, at (312) 886-9871 or at chachakis.daniel@epa.gov.

Sincerely,

Gary J. Victorine, Chief
RCRA Branch

Enclosure

cc: John Elling, MPCA (john.elling@state.mn.us)
Laura Schmidt, Anoka County (laura.schmidt@co.anoka.mn.us)

U. S. Environmental Protection Agency
Region 5, Land and Chemicals Division
RCRA Branch
77 West Jackson Boulevard
Chicago, Illinois 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

SITE NAME:	ECO Finishing Company, Incorporated
EPA ID NUMBER:	MND985767482
ADDRESS:	5100 Industrial Boulevard Northeast Fridley, Minnesota, 55421
DATE OF INSPECTION:	April 28, 2015
EPA INSPECTOR:	Daniel Chachakis Environmental Inspection Specialist

PREPARED BY: Daniel Chachakis, EPS, Compliance Section 1 — Date: 06/29/2015

APPROVED BY: Michael Cunningham, Chief, Compliance Section 1 — Date: 6/29/15

Purpose of Inspection: This inspection was an evaluation of ECO Finishing Company, Incorporated's (ECO Finishing) compliance with hazardous waste, used oil, and universal waste regulations found at the Minnesota Hazardous Waste Rules (Minn. R.) and the Code of Federal Regulations (CFR). I performed the inspection with two inspectors from Anoka County. The inspection was an EPA lead Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection (CEI). The site notified as large quantity generator (LQG). The last CEI was a MPCA inspection on February 3, 2011.

Participants

Inspector(s):

Dan Chachakis, EPS, EPA
Laura Schmidt, Environmental Health Specialist, Anoka County
Edmond Smith, Environmental Health Specialist, Anoka County

Site Representative(s):

Jay Esmay, President, Eco Finishing Company
Bob Bauer, Operations Manager, Eco Finishing Company
Paul Madden, Technical Director, Eco Finishing Company

Introduction: On April 28, 2015, the inspectors arrived at the site at approximately 8:30 AM. We introduced ourselves, presented my inspector credentials or county identification, provided business cards, and described the purpose and process by which we intended to conduct the inspection. Mr. Madden provided us with a description of the site operations, led the tour, and provided us with the records we requested for review.

I provided a Small Business Resources information sheet and the Minnesota Technical Assistance Program brochure to Mr. Madden. Eco Finishing already works with MTAP to reduce wastewater generated at the facility. We discussed for the site tour the following safety equipment was recommended or required: safety glasses with side shields and steel-toed boots.

I informed Mr. Madden that Eco Finishing could claim any information gathered during the inspection as Confidential Business information including: verbal information, documents and photographs. Mr. Madden did not make a CBI claim on the information gathered during the inspection. Mr. Madden also did not object to the use of my camera to take pictures.

Site Description: I gathered the following information about Eco Finishing during an internet search of the business.

- ECO Finishing opened for business in 1994 as a state-of-the-art plating company, providing electroplating, anodizing, phosphating and electroless nickel plating services. With over 60,000 square feet of clean, well lit space, ECO Finishing has a streamlined electroplating process that complies with all EPA regulations regarding safety and waste treatment.

- ECO is a privately held company with over 60,000 sq. ft. of space that provides more than 20 metal and chemical finishes, including: Anodizing Aluminum, Nickel Plating, Black Oxide Coatings, Copper Plating, Zinc Plating, Nickel Plating, Electroless Nickel, Phosphate Coating,

Hard Coat Anodizing, and Chemical Conversion Coatings. ECO provides both rack and barrel plating and can plate parts that are up to 13 feet in length for both low and high volume orders.

- ECO Finishing is a full-service finisher with over 20 finishes. We provide coatings to a wide range of industries. Quality and fast turn-around is our focus. Large production runs to small lot orders. Complete laboratory services.

Finishes	Tank Sizes
Anodize Black & Clear	11' x 3' x 6'
Anodize & Color (Red, Blue, Green, Gold)	11' x 2' x 6'
Hardcoat Anodize	8' x 2' x 6'
Hardcoat and Black Dye	8' x 2' x 6'
Hardcoat Anodize & Teflon	8' x 2' x 6'
Alkaline Derusting	13' x 3' x 8'
Black Oxide	5' x 3' x 3'
Baking	
Black Zinc	11.5' x 1.5' x 5'
Bright Dip	7' x 2' x 4'
Certs	
Chromate on Aluminum	9' x 2' x 6'
Chromate on Zinc Die Cast	9' x 2' x 6'
Chrome, Decorative	11.5' x 2' x 5'

Finishes	Tank Sizes
Copper	11.5' x 2' x 5'
Copper .001	11.5' x 2' x 5'
Electroless Nickel on Steel	7' x 2' x 4'
Electroless Nickel on Aluminum	7' x 2' x 4'
Electroless Nickel on Brass or Copper	7' x 2' x 4'
Manganese Phosphate	3' x 2.5' x 3'
Masking	
Nickel, Bright	11.5' x 2' x 5'
Passivation	11.5' x 2' x 5'
Phosphate, Zinc	3' x 2.5' x 3'
Salt Spray Corrosion Testing	
Zinc & Chromate (Clear or Yellow)	13' x 3' x 8'
Zinc & Chromate (Olive Drab)	11.5' x 1.5' x 5'
Zinc with Rust Inhib or Seal	13' x 3' x 8'

- Minnesota Technical Assistance Program project: Researching water conservation opportunities in the electroplating process, 2014.

I included two pictures from the facility's website (Search Picture 1 and SP 2).

Picture #: SP 1
Date: Unknown
Photographer: Eco Finishing
Location: Outside
Subject: Loading Dock

Picture #: SP 2
Date: Unknown
Photographer: Eco Finishing
Location: Inside
Subject: Work Area

Mr. Madden stated that the building is approximately 60,000 square feet, and that there are approximately 100 employees working in three shifts conducting 24 hour operations.

Mr. Madden stated that the site generates F006 hazardous waste from its filter press attached to its wastewater treatment system. The site also generates spent chemicals from its batch process tanks, as well as sludge from tank bottoms. The facility uses drums or bags to containerize hazardous waste. He stated there are no hazardous waste storage tanks. He stated that the facility generates used bulbs. Mr. Madden stated that there are satellite accumulation areas and two less-than 90-day hazardous waste storage areas onsite.

Mr. Madden stated that the facility stores 1,500 gallon empty, portable storage tanks onsite, outside.

Site Tour: We observed facility operations including: satellite accumulation areas, the less-than 90-day accumulation containers, solid waste areas, product storage areas, used oil storage, universal waste accumulation, and emergency equipment. I took photographs of the various facility operations, waste operations, and waste storage/accumulation areas during the site tour. We began in the South Building.

South Building: Operations in this building began in or around 1994. We moved to the Big Zinc Line.

Big Zinc Line: I observed, and took a picture of, what Mr. Madden described as the "Big Zinc Line" (Picture 1).

Picture #: 1 (DSCN1148)
Date: April 28, 2015
Photographer: Dan Chachakis
Location: South Facility
Subject: "Big Zinc" plating line

I looked with a flashlight at the floor under the line and observed the presence of liquid.

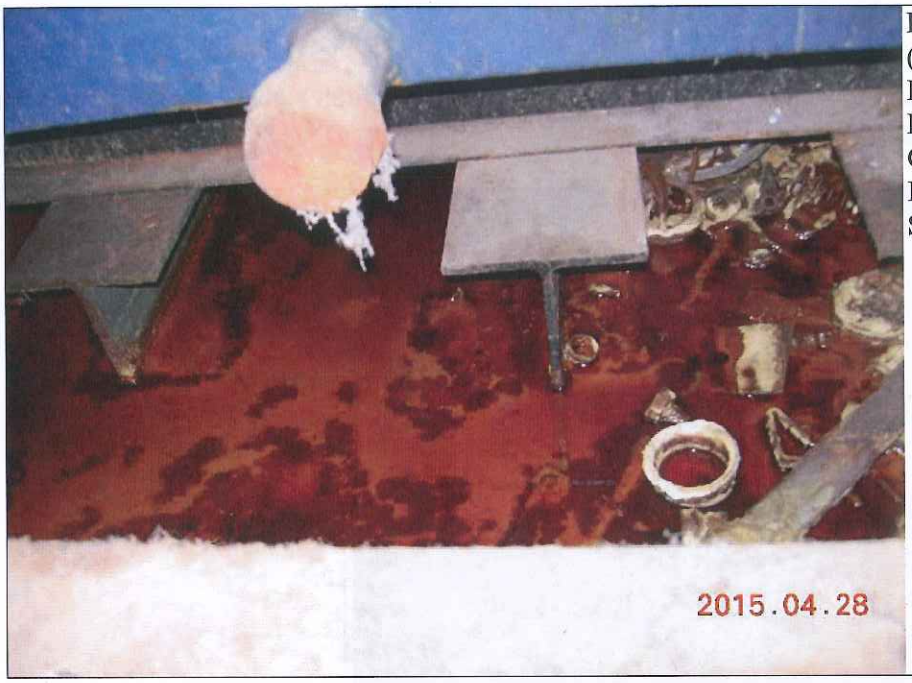
I observed, and took a picture of, a sump (Picture 2). Mr. Madden explained that the sump is part of the wastewater treatment system. This is a point where workers remove liquids accumulated under the line.

Picture #: 2
(DSCN1149)
Date: April 28, 2015
Photographer: Dan Chachakis
Location: South Facility
Subject: "Big Zinc" plating line sump

Mr. Madden stated that the facility has the ability to test materials for meeting solid or hazardous waste criteria prior to being sent off for disposal. We moved to the Barrel Zinc Line.

Barrel Zinc Line: I observed, and took two picture of, material under the zinc line (Pictures 3 and 4).

Picture #: 3
(DSCN1150)
Date: April 28, 2015
Photographer: Dan Chachakis
Location: Barrel Zinc Line
Subject: Under the line



Picture #: 4
(DSCN1151)
Date: April 28, 2015
Photographer: Dan Chachakis
Location: Barrel Zinc Line
Subject: Under the line

We moved to the Small Zinc Line.

Small Zinc Line: I observed, and took a picture of, a grated sump (Picture 5). Mr. Madden stated that the sump drains to the basement (Picture 5).

Picture #: 5
(DSCN1152)
Date: April 28, 2015
Photographer: Dan Chachakis
Location: Small Zinc Line
Subject: Grated sump

We moved to the nickel line.

Nickel Line: I observed, and took a picture of, a bucket that Mr. Madden stated was holding nickel solid waste from the Nickel Line (Picture 6).

Picture #: 6
(DSCN1153)
Date: April 28, 2015
Photographer: Dan Chachakis
Location: Nickel Line
Subject: Bucket of waste

I observed, and took a picture of, white material in a secondary container (Picture 7). Mr. Madden stated the material was most likely sodium carbonite.

Picture #: 7
(DSCN1154)
Date: April 28, 2015
Photographer: Dan Chachakis
Location: Nickel Line
Subject: Accumulation of white material

We moved to the Small Zinc Line.

Small Zinc Line: I observed, and took a picture of, green material under the hydrochloric acid tank (Picture 8).

Picture #: 8
(DSCN1155)
Date: April 28, 2015
Photographer: Dan Chachakis
Location: Nickel Line
Subject: Accumulation of green material

Brightness + 20%
Contrast + 5%

We moved to the Nickel / Copper / Chrome Line.

Nickel / Copper / Chrome Line: Mr. Madden stated that the lines uses trivalent chrome.

We moved to the Electrolysis Nickel Line.

Electrolysis Nickel Line: I observed, and took a picture of, nickel in containment (Picture 9).

Picture #: 9
(DSCN1156)
Date: April 28, 2015
Photographer: Dan Chachakis
Location: Nickel / Copper / Chrome Line
Subject: Nickel in secondary containment

Mr. Madden stated that the material in containment in Picture 9 goes to the wastewater treatment system.

We moved to the Black Oxide Line.

Black Oxide Line: I observed, and took a picture of, brown material in containment (Picture 10).

Picture #: 10
(DSCN1157)
Date: April 28, 2015
Photographer: Dan Chachakis
Location: Black Oxide Line
Subject: Accumulation of brown material

I observed, and took a picture of, a container with a non-regulated label and the words, "Oil Lux" (Picture 11).

Picture #: 11
(DSCN1158)
Date: April 28, 2015
Photographer: Dan Chachakis
Location: Black Oxide Line
Subject: Container with the words, "Oil Lux"

Mr. Madden stated that the material in the container in Picture 11 is managed as MN100.

I observed, and took a picture of, a buildup of what Mr. Madden described as sodium hydroxide (Picture 12).

Picture #: 12
(DSCN1159)
Date: April 28, 2015
Photographer: Dan Chachakis
Location: Black Oxide Line
Subject: Sodium Hydroxide

We moved to the North Building.

North Building: Mr. Madden stated that the north building began operations in or around 1999. We moved to the Maintenance Area.

Maintenance: Mr. Madden stated that the workers use methyl ethyl ketone (MEK) and generate waste rags in this area. We moved to the Hand Line.

Hand line: I observed, and took a picture of, what appeared to be sodium hydroxide accumulating on the outside of the process tanks (Picture 13).

Picture #: 13
(DSCN1160)
Date: April 28, 2015
Photographer: Dan Chachakis
Location: Hand line
Subject: Sodium Hydroxide accumulating on the outside of the process tanks.

I observed, and took a picture of, liquid brown/yellow and green in color under the walkway (Picture 14).

Picture #: 14
(DSCN1161)
Date: April 28, 2015
Photographer: Dan Chachakis
Location: Hand Line
Subject: Brown, yellow and green liquid under walkway.

+40% brightness, 20% contrast

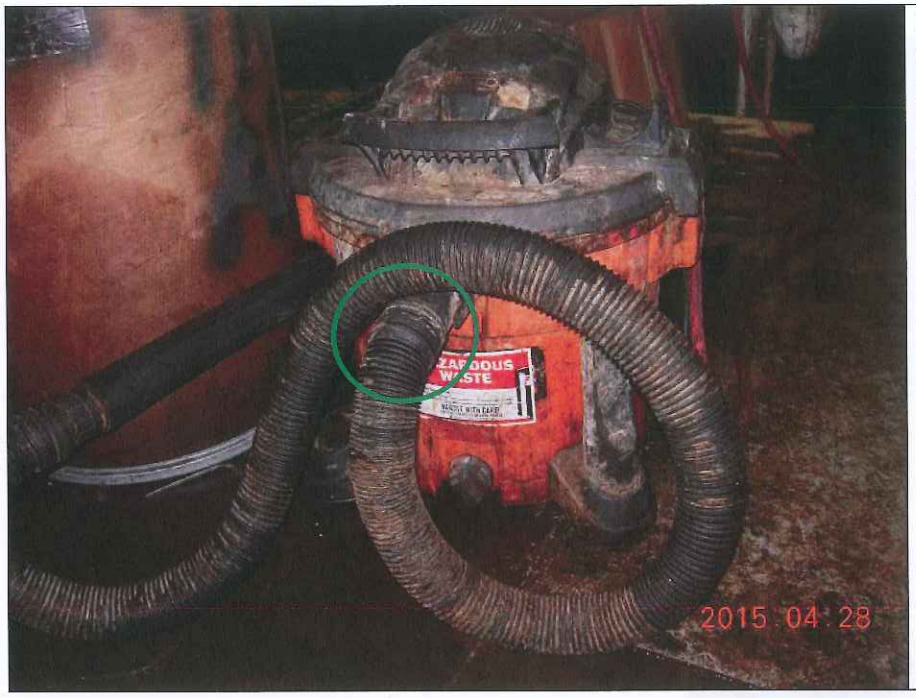
We moved to the Phosphate Line.

Phosphate Line: I did not observe any issues with the phosphate line. We moved to the Chromate Line.

Chromate Line: I observed, and took a picture of, rinse water (Picture 15).

Picture #: 15
(DSCN1162)
Date: April 28, 2015
Photographer: Dan Chachakis
Location: chromate line
Subject: Rinse water

I observed, and took a picture of, a vacuum with a hazardous waste label (Picture 16).



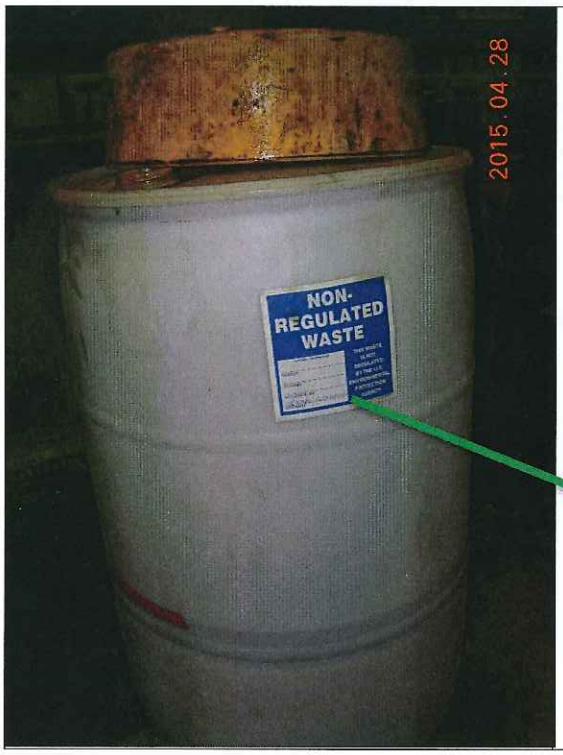
Picture #: 16 (DSCN1163)
Date: April 28, 2015
Photographer: Dan Chachakis
Location: chromate line
Subject: Vacuum

I observed, and took a picture of, material in the vacuum from Picture 16 (Picture 17).

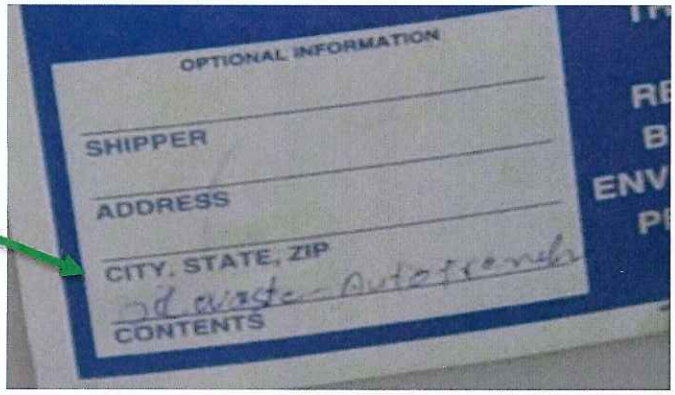
Picture #: 17 (DSCN1164)
Date: April 28, 2015
Photographer: Dan Chachakis
Location: chromate line
Subject: Material in a container

We moved to the Zinc Automatic Line.

Zinc Automatic Line: I observed, and took a picture of, a container with a non-regulated waste label marked with the words, "Oil Waste - Auto Trench" (Picture 18).



Picture #: 18
(DSCN1165)
Date: April 28, 2015
Photographer: Dan Chachakis
Location: Zinc automatic line
Subject: "Oil Waste"



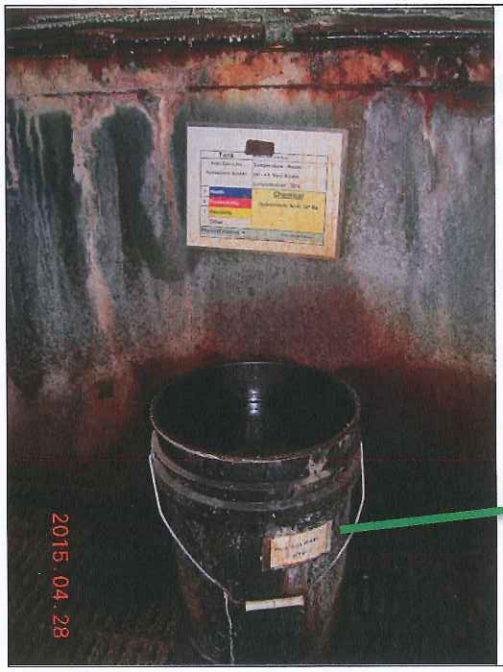
Mr. Madden stated that material contains hydraulic oil.

I observed, and took a picture of, a container without a label or markings describing the contents of the container (Picture 19). Mr. Madden stated the container held used oil.

Picture #: 19
(DSCN1166)
Date: April 28, 2015
Photographer: Dan Chachakis
Location: Zinc automatic line
Subject: Material in a container

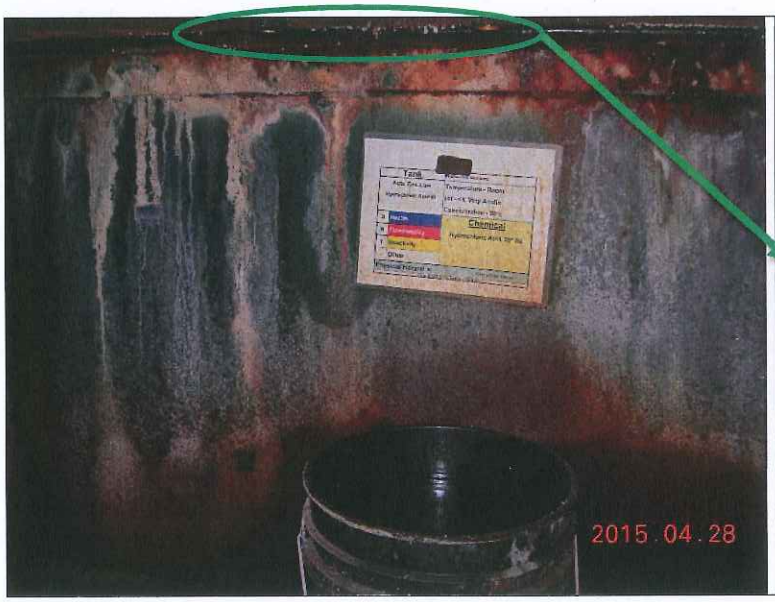
Mr. Madden stated the facility has an air permit. I observed that the doors were open to the outside at the time of the inspection.

I observed, and took a picture of, a container marked with the words, "Hazardous Waste Drip Pan" (Picture 20). I observed that the container was approximately 80% full.



Picture #: 20
(DSCN1167)
Date: April 28, 2015
Photographer: Dan Chachakis
Location: Zinc automatic line
Subject: Material in a container

I observed that the container in Picture 20 was in position to collect drips, and was not closed. I observed, and took a picture of, two open pipe ends above the container in Picture 20 (Picture 21). There may be a requirement for a second container.



Picture #: 21
(DSCN1168)
Date: April 28, 2015
Photographer: Dan Chachakis
Location: Zinc automatic line
Subject: Pipes above container

We moved to the Chiller System.

Chiller System: I observed, and took a picture of, pink material in the chiller system containment area (Picture 22).

Picture #: 22
(DSCN1169)
Date: April 28, 2015
Photographer: Dan Chachakis
Location: Chiller system
Subject:

We moved to the Anodize Line.

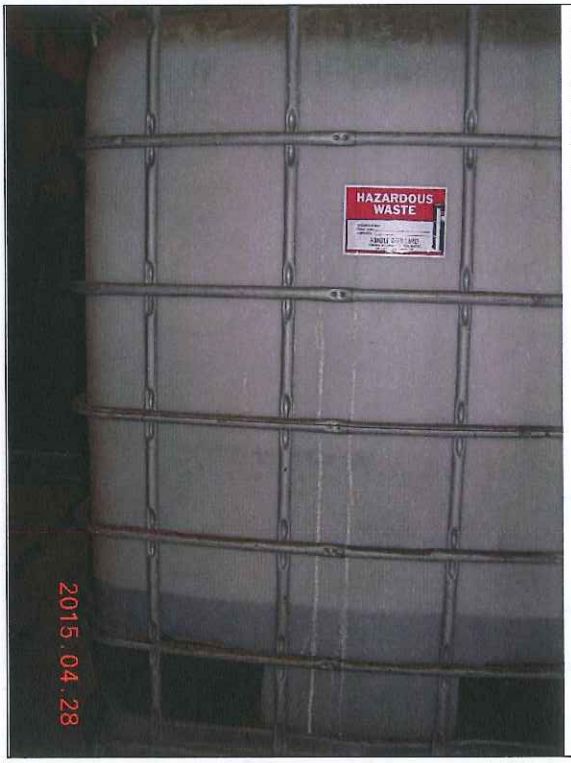
Anodize Line: I did not observe any issues with the anodize line. We moved to the Hard Coat Line.

Hard Coat Line: I did not observe any issues with the hard coat line. We moved to Hazardous Waste Storage Area #1.

Hazardous Waste Storage Area #1: I observed, and took a picture of, containers in hazardous waste storage area #1 (Picture 23). I observed that the containers were stacked on three large shelves.

Picture #: 23
(DSCN1170)
Date: April 28, 2015
Photographer: Dan Chachakis
Location: Hazardous Waste Storage Area #1
Subject: Containers on shelf

I observed, and took a picture of, a tote with a hazardous waste label, marked with the accumulation start date, "4-13-15" and the words, "Nitric Acid" (Picture 24). Note: the flash from the camera washed out the writing on the label.

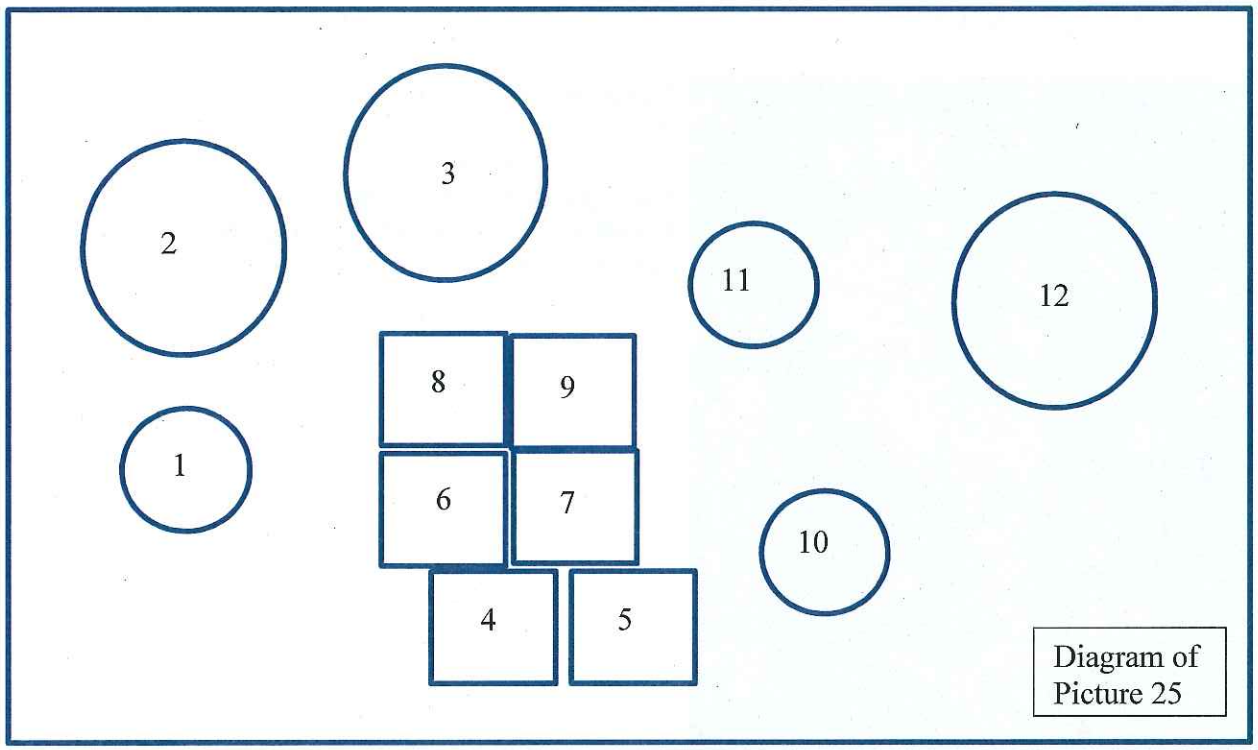


Picture #: 24
(DSCN1171)
Date: April 28, 2015
Photographer: Dan Chachakis
Location: Hazardous Waste Storage Area #1
Subject: Tote

I observed that the shelf contained containers of chemicals. Mr. Madden stated that the chemicals were no longer in use, and had not been in use for over a year. I took three pictures of these chemicals; the lower shelf (Picture 25), the middle shelf (Picture 26), and the top shelf (Picture 27).

Picture #: 25
(DSCN1172)
Date: April 28, 2015
Photographer: Dan Chachakis
Location: Hazardous Waste Storage Area #1
Subject: Lower shelf of chemicals not in use

I diagramed and recorded information from the containers in Picture 25.



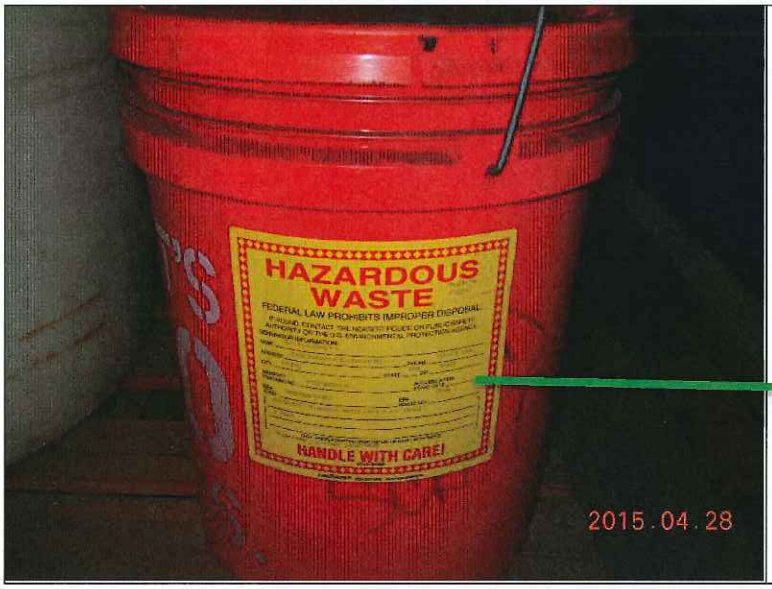
Contents of Picture 25 and Diagram of Picture 25		
#	**Name on label**	**Comments by facility personnel**
1	Extender GP50BR	Lot # 081902
2	Sodium Thiosulfate	Occasional use
3	Sodium Acetate	Occasional use
4	CL-4 Adjuster	No comments
5	CL-4 Adjuster	No comments
6	CL-4 Adjuster	No comments
7	CL-4 Adjuster	No comments
8	CL-4 Adjuster	No comments
9	CL-4 Adjuster	No comments
10	Potassium Permanente	In use
11	Potassium Permanente	In use
12	Acid salt	In use

Mr. Madden stated that the second and third rows, Pictures 26 and 27, respectively, contained cleaners in use.

Picture #: 26 (DSCN1173)
Date: April 28, 2015
Photographer: Dan Chachakis
Location: Hazardous Waste Storage Area #1
Subject: Middle shelf of chemicals not in use

Picture #: 27 (DSCN1174)
Date: April 28, 2015
Photographer: Dan Chachakis
Location: Hazardous Waste Storage Area #1
Subject: Top shelf of chemicals not in use

I observed, and took a picture of, a container in the 2nd row, bottom shelf (Picture 28). I observed that there was no accumulation start date marked on the label or elsewhere on the container. Mr. Madden had staff correct this error, and the container was marked with the accumulation start date of 4/6/2015.



Picture #: 28
(DSCN1175)
Date: April 28, 2015
Photographer: Dan Chachakis
Location: Hazardous Waste Storage Area #1
Subject: Container, second row, bottom shelf

I observed a container in the second row, middle shelf (Picture 29). I recorded the hazardous waste label was marked with the accumulation start date of, "3-3-15", and the words, "E-less trench / zinc waste."

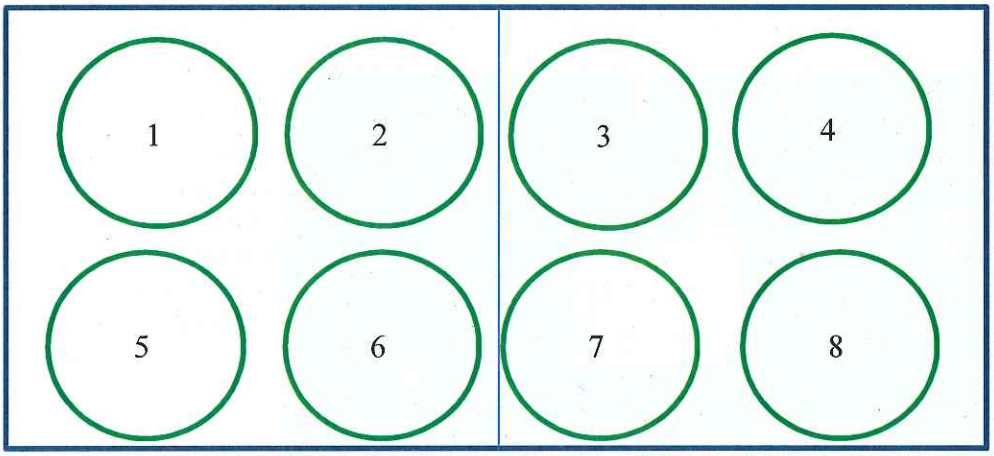
Picture #: 29
(DSCN1176)
Date: April 28, 2015
Photographer: Dan Chachakis
Location: Hazardous Waste Storage Area #1
Subject: Container, second row, middle shelf

I observed on the top shelf, second row, four containers marked with the words, "Nickel strip solution" and the accumulation start date of, "4/16/2015."

I observed, took a picture of, and diagramed the third row, bottom shelf (Picture 30).

Picture #: 29 (DSCN1176)
Date: April 28, 2015
Photographer: Dan Chachakis
Location: Hazardous Waste Storage Area #1
Subject: Container, second row, middle shelf

Picture #: 30 (DSCN1177)
Date: April 28, 2015
Photographer: Dan Chachakis
Location: Hazardous Waste Storage Area #1
Subject: Containers, third row, bottom shelf



Diagram, Picture 30

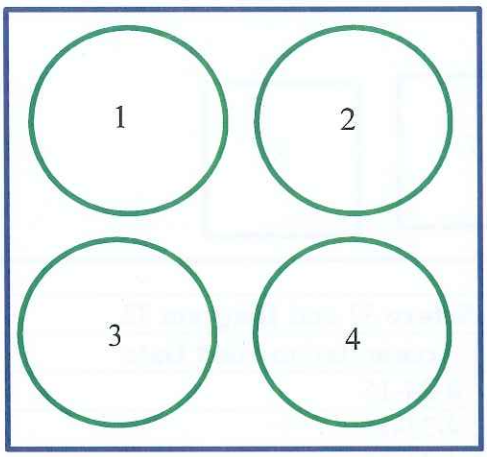
Contents of Picture 30 and Diagram of Picture 30		
#	**Accumulation start date**	**Contents of container**
1	4-12-15	Cleaner sludge – Hard chrome
2	4-22-15	CN Carbonates state
3	4-16-15	Carbonates – Auto
4	2-20-15	Cyanide Carbonate Auto
5	4-14-15	Carbonate – Auto
6	4-13-15	Carbonate – Auto
7	4-3-15	Oil/Chrome waste
8	4-18-15	Carbonates – Auto

I observed, and took a picture of, the third row, bottom shelf, backside (Picture 31).

Picture #: 31 (DSCN1178)
Date: April 28, 2015
Photographer: Dan Chachakis
Location: Hazardous Waste Storage Area #1
Subject: Containers, third row, bottom shelf, back-side

I observed the third row, middle shelf, and recorded the following information.

Diagram, Picture 31

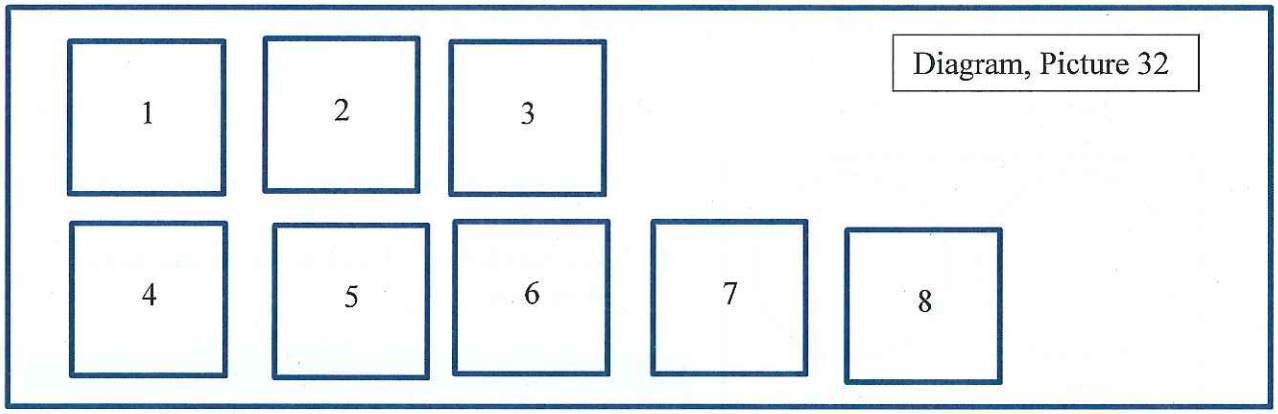


Contents of Picture 31 and Diagram of Picture 31		
#	Accumulation start date	Contents of containers
1	02/09/15	Mag Pans Sludge
2	1/29/15	Nickel waste*
3	4/5/15	Mag Phos sludge
4	4/5/15	Mag Phos sludge

*Mr. Madden stated may contain more than nickel.

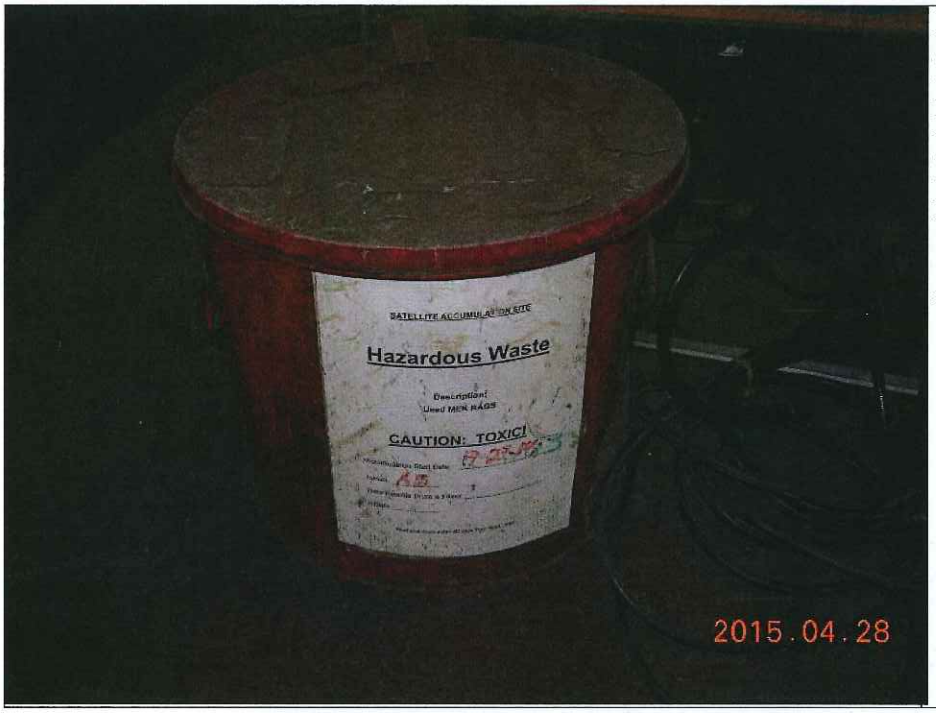
I observed, and took a picture of, the hazardous waste tote storage area (Picture 32). I observed that each had a hazardous waste label, and each was marked with the characteristic "F006."

Picture #: 32 (DSCN1179)
Date: April 28, 2015
Photographer: Dan Chachakis
Location: Hazardous Waste Storage Area #1
Subject: Hazardous Waste Tote storage area



Accumulation Start Dates for Totes in Picture 32 and Diagram 32			
#	**Accumulation State Date**	#	**Accumulation Start Date**
1	4-25-15	5	4-24-15
2	4-27-15	6	4-23-15
3	4-27-15	7	4-23-15
4	4-25-15	8	4-22-15

I observed, and took a picture of, a hazardous waste rag container (Picture 33).

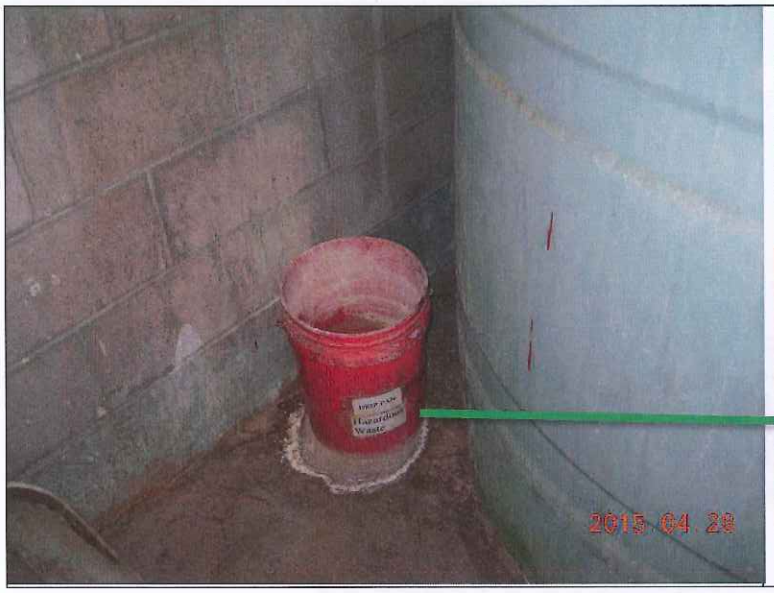


Picture #: 33 (DSCN1180)
Date: April 28, 2015
Photographer: Dan Chachakis
Location: Hazardous Waste Storage Area #1
Subject: Hazardous Waste rag container

We moved to the Basement, and the wastewater treatment system.

Basement: I observed the wastewater treatment system.

I observed, and took a picture of, a pipe above a bucket (Picture 34). Mr. Madden stated the bucket contained waste cyanide.



Picture #: 34
(DSCN1181)
Date: April 28, 2015
Photographer: Dan Chachakis
Location: Basement
Subject: Bucket

I observed, and took a picture of, a container (Picture 35). I observed that this container contained less than two inches of material, was not closed, and was apparently not in position to capture waste.

Picture #: 35
(DSCN1182)
Date: April 28, 2015
Photographer: Dan Chachakis
Location: Basement
Subject: Bucket

I observed, and took a picture of, a container that was not in use (Picture 35) and not closed. This was near the cyanide destruct clarifier tank.

Picture #: 36
(DSCN1183)
Date: April 28, 2015
Photographer: Dan Chachakis
Location: Basement
Subject: Bucket

We moved upstairs to the 2nd Hazardous Waste Storage Area.

2nd Hazardous Waste Storage Area: I observed, and took a picture of, a container marked with the words, "Chrome Waste" and the accumulation start date "4/10/15" (Picture 37).

Picture #: 37
(DSCN1184)
Date: April 28, 2015
Photographer: Dan Chachakis
Location: 2nd Hazardous Waste Storage Area
Subject: Container

I observed, and took a picture of, a vacuum used to accumulate hazardous waste (Picture 38).

Picture #: 38
(DSCN1185)
Date: April 28, 2015
Photographer: Dan Chachakis
Location: 2nd Hazardous Waste Storage Area
Subject: Vacuum

We moved to the sludge presses at the end of the wastewater treatment system.

Sludge Presses, End of Wastewater Treatment System: I observed that there were two sludge presses in this area. I observed, and took a picture of, sludge press container 1 (Picture 39).

Picture #: 39
(DSCN1186)
Date: April 28, 2015
Photographer: Dan Chachakis
Location: Sludge press 1
Subject: Container

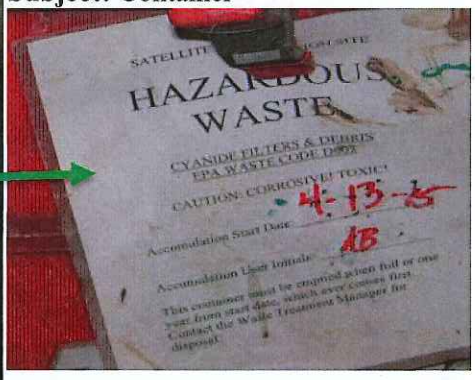
I observed, and took a picture of, sludge press container 2 (Picture 40).

Picture #: 40 (DSCN1187)
Date: April 28, 2015
Photographer: Dan Chachakis
Location: Sludge press 2
Subject: Container

Mr. Madden stated the wastewater treatment system is always running.

I observed, and took a picture of, a container with a hazardous waste label, and words, "Caution: Cyanide and Chrome", the characteristic "D003", and an accumulation start date of "4/13/15" (Picture 41).

Picture #: 41 (DSCN1188)
Date: April 28, 2015
Photographer: Dan Chachakis
Location: Sludge press area
Subject: Container



I observed, recorded information from, and took a picture of two containers (Picture 42).

Picture #: 42
(DSCN1189)
Date: April 28, 2015
Photographer: Dan Chachakis
Location: Sludge press area
Subject: Two containers

Contents of Containers in Picture 42			
#	**Label**	**Accumulation Start Date**	**Contents on label**
1	Hazardous Waste	4-19-15	Mag Phos Sludge
2	Hazardous Waste	4-16-15	Olive drab sludge

I observed, and took a picture of, a container with a hazardous waste label marked with the words, "Used cyanide waste", the characteristic, "D003", and accumulation start date, "3-20-13" (Picture 43).

Picture #: 43
(DSCN1190)
Date: April 28, 2015
Photographer: Dan Chachakis
Location: Sludge press area
Subject: Container

We moved to the Sludge Packing Area.

Sludge Packing Area: I observed, and took a picture of, the sludge packing area (Picture 44). Mr. Madden stated this area is where sludge from the containers in Pictures 39 and 40 is transferred to totes. He stated that the containers are lifted by forklift. I observed that the bag in place does not have a hazardous waste label or accumulation start date.

Picture #: 44
(DSCN1191)
Date: April 28, 2015
Photographer: Dan Chachakis
Location: Sludge Packing Area
Subject: Tote and empty container

We moved to the Chromatic Line.

Chromatic Line: I observed, and took a picture of, a sump that was full of liquid (Picture 45).

Picture #: 45
(DSCN1192)
Date: April 28, 2015
Photographer: Dan Chachakis
Location: Chromatic Line
Subject: Sump

We moved to the Shipping / Receiving Area.

Shipping / Receiving: Mr. Madden stated that used bulbs were stored in this area. I observed that there were no used bulbs stored in this area at the time of the inspection.

Records Review: The inspectors reviewed waste profiles/characterizations, waste analysis records, manifests, land disposal restriction notifications (LDR), and the contingency plan. I completed a LQG checklist during the records review, *see* Attachment A.

Manifests: I reviewed, and recorded information from the following manifests.

2015

- 014594514:
  Transporter: Lake Denoon Transport LLC, WIR000138016
  TSDF: Badger Disposal of WI, Inc., WID988580056
  Waste cyanides D002/D003/D007/MN01/D001/D008
  Waste profile # LES0310 (CN and CR filters / debris)
  Generator Representative: Paul Madden
  LDR Form: Cyanide containing hazardous filter and debris (CR and CN)

- 014594513JJK:
  Waste corrosive liquid (sodium hydroxide) D002
  MN100 Non-regulated material
  Waste profile # 03905 (electro / soak cleaner)
  Waste profile # LES0307 (waste oil)
  Waste profile # LES0311 non-hazardous filters and debris
  LDR form: Acid waste (Liquid, sludge solid)
  LDR form: Electro / soak cleaner
  LDR form: Waste oil
  LDR form: Non-hazardous filters and debris

- 012395760JJK
  TSDF PDC #1, ILD000805812
  Facility representative: Adam Bauer

- 013430801JJK: Hazardous waste solid (F006)

- 012395760JJK, 012395759JJK, 012395758JJK

- 012314986JJK:
  Waste caustic alkali liquids (sodium carbonate, sodium hydroxide) D007 / D002
  Waste profile # 174115 (carbonate solids)
  Waste profile LES0310 (CN and CR filters / debris)
  LDR form Sodium Carbonate

- 012395757JJK, 012395756JJK, 012395755JJK, 012314956JJK, 012395754JJK, 012395753JJK, 012395752JJK, 012395751JJK

- 000492859VES
  Transporter: Veolia ES Technical Solutions, NJD080631369
  TSDF: Veolia ES Technical Solutions, WID003967148
  Waste caustic alkali liquids (chromium) F008 / D007 / D002
  Waste corrosive liquid, basic inorganic (sodium hydroxide) D002 / F007
  Hazardous waste liquid (chromium water) D007

- 012395750JJK, 012395749JJK, 012395748JJK, 012395747JJK, 012395746JJK

- Used oil ZZ00217096: 220 G, M100, 01/08/15

2014

- 012395745JJK, 000876325VES

- ZZ00217509: Used oil, coolant

- 012395761JJK, 012395744JJK

- 002414458GBF: Facility Representative: Vern Otto

- 013490291JJK, 012395743JJK, 012395741JJK, 012395741JJK, 012395742JJK, 012395740JJK, 012395739JJK, 012314826JJK, 012395738JJK, 000875225VES, 012395737JJK, 012395736JJK, 012395734JJK, 000885578VES, 012395735JJK, 012395733JJK, 012395732JJK, 012395731JJK, 012395703JJK, 011326432JJK, 012395729JJK, 000684449VES, 012395728JJK

- 012395727JJK: Facility Representative: John Atkins

- 013489574JJK, 011326431JJK

- ZZ00217492: Non-regulated waste treatment solution

- 011326430JJK, 011326429JJK, 000875301VES, 011326428JJK, 011326427JJK, 011326426JJK, 011326408JJK, 011326409JJK, 011326410JJK, 011326411JJK, 000322179VES, 011326412JJK, 011326413JJK, 012540603JJK, 011326414JJK

- ZZ00222379:
  Used Oil
  OSI Environmental, MNR000055988

- 000322265VES, 012540775JJK, 011326415JJK, 011326416JJK, 011326417JJK, 011326418JJK, 000917590VES, 011326419JJK, 011326420JJK, 011326421JJK, 011326422JJK, 011326423JJK, 011326424JJK, 000919100VES, 011326425JJK

- Manifests for 2012 and 2013 were available.

Waste Determinations: I reviewed, and recorded information from, the following waste determinations.

- Profile 77627; waste oil: a "used oil."

- Profile 77629 Waste caustic alkali liquids; cyanide reactive: D002, D007, F008.

- Profile 442648 Electro Soak Sludge: D002; sodium hydroxide.

- Profile LES0312 / 05918922: metal hydroxide sludge from wastewater filter press; D007, F006, F019.

- Lab results, F006 Filter Cake: No TCLP exceedances. Candidate for de-listing.

- Profile 174115, Sodium Carbonate: D002 corrosive.

- Profile LES0311 / 77676: Non-hazardous fillers and debris.

Training Program

- I reviewed the records for the training program. Mr. Madden confirmed that training has not occurred yet for 2015.

- I recorded that the 2014 training included the classes, "Hazardous Communication and Awareness" and "Generator Requirements." I concluded after the review that the training was not facility specific.

- I recorded that the 2013 training included the classes, "Hazardous Communication and Awareness," "Generator Requirements," and "Personnel Protective Equipment." Again, I concluded after the review that the training was not facility specific.

- I recorded that the records go back to 2009. Mr. Madden confirmed that records were not available for the years prior to 2009.

- I created the following chart to record additional training program information.

Employee	Position	2012	2013	2014	2015
Atkins, John	Lab Tech	8/6/12 Date of assignment 11/09/12 Date of initial training	10/16/2013 Annual Training	10/08/2014 Date of annual training	Due by 10/07/2015
Bauer, Adam	Waste Treatment Operator	09/20/2012 Date of assignment 11/09/12 Date of initial training	10/16/2013 Annual Training	10/08/2014 Date of annual training	Due by 10/07/2015
Otto, Verlyn	Waste Treatment Operator			04/20/2014 Date of assignment 10/08/2014 Date of initial training	Due by 10/07/2015
Schneider, Herbert	Waste Treatment Operator				04/20/2015 Date of Assignment Within window for initial training as of the date of the inspection.
Stack, Thomas	Waste Treatment Operator			09/29/2014 Date of assignment 10/08/2014 Date of initial training	Due by 10/07/2015
Madden, Paul	Technical Director		3/18/2013 Date of assignment 10/16/2013 Date of initial training [more than 6 months]	10/08/2014 Date of annual training	Due by 10/07/2015

- I recorded that there was a job title for the Waste Treatment Operator, with job responsibilities and job description; however, the document does not include hazardous waste responsibilities.

- I recorded that there was a job title for Laboratory Technician, with job responsibilities, qualifications, duties, and a job description; however, the document does not include hazardous waste responsibilities.

- I recorded that there was the job title for Technical Director, with job responsibilities and job description; however, the document does not include hazardous waste responsibilities.

Contingency Plan: I reviewed, and recorded information from, the contingency plan.

- The facility must update the emergency response team members.

- The plan addressed fire, explosion, and release.

- The plan addressed the Coon Rapids and Minneapolis Fire departments, the Fridley Fire and Police Departments, and Unity Hospital.

- The plan contained a list of emergency equipment with their location and capabilities.

- The plan includes an evacuation plan, and that the facility has alarm pull stations, a public address system, and phones. I recommended that the facility add the assembly areas to its map.

- The facility did not maintain records documenting submission to potential responding agencies, especially those listed in the plan.

Closing Conference: We conducted a closing conference, attended by facility representatives Jay Esmay, President, Paul Madden, Technical Director, and Bob Bauer, Operations Manager; Anoka County inspectors Laura Schmidt and Edmond Smith; and myself. We summarized the following issues identified during the inspection.

- One container potentially exceeded 90 day storage.

- One missing accumulation start date.

- No record of contingency plan submission to potentially responding agencies.

- Satellite containers not in use without covers.

- Marking or labeling containers with the words, "Used Oil."

- Facility specific emergency response training is not part of the training program.

- Recommended placing assembly areas of the facility evacuation map.

- Update the contingency plan to add the new response team members.

- Discussion of the difference between wastewater treatment system conveyance of wastewater and accumulation of hazardous waste in storage tanks.

- Discussion of when a sump meets the definition of a hazardous waste storage tank.

I again mentioned that ECO Finishing could make claims of CBI on the material copied, photographs, and information gathered during the inspection. The facility representatives did not make any CBI claims. We departed the facility at approximately 3:15 PM.

Attachments
A. Checklist

ATTACHMENT A
Checklist

Minnesota Pollution Control Agency

Report Title: Large Quantity Generator (LQG) Compliance Evaluation Inspection Checklist

Preferred ID: MND 985 767 482 Regulated Party: Eco Finishing Company

Date: 04/28/2015 Inspector: Dan Chachakis

G1: Licensing / EPA / Permits			
Rule	**Requirement**	**Compliance Status**	**Remarks**
7045.0221	Has Regulated Party obtained a generator identification number?	IC	
7045.1020 A	Metro Area - Does the Regulated Party have an approved license?	NA	Has one, but not required by EPA
7045.0225 1	Outstate - Does the site have a current hazardous waste generator license?	NA	
7045.0230 1, B	Outstate - Did the Regulated Party include all hazardous waste streams on its license application?	NA	
7045.0225 2	Is the Regulated Party's license displayed in a public area at the licensed site?	NA	Is posted, but not required by EPA
7001.0520 1, A	Does the Regulated Party operate as a TSD without a permit?	NC	exceeded 90 day storage exemption
MS 116.48 1	Are aboveground tanks >500 G registered with the MPCA? Are underground tanks registered with the MPCA?	NA	Not inspected by EPA

G1: Waste Evaluation			
Rule	**Requirement**	**Compliance Status**	**Remarks**
7045.0214 1	Have wastes been evaluated within 60 days of the date they were initially generated?	IC	
7045.0294 3	Are test result records of waste analyses kept for 3 years from the last time the waste was sent to a TSDF (on- or off-site)?	IC	

G1: General Management for Generators			
Rule	**Requirement**	**Compliance Status**	**Remarks**
7045.0208 1	Is hazardous waste properly disposed of?	IC	
7045.0208 1, E	Does the Regulated Party comply with the POTW requirements for sewered hazardous waste?	IC	Pre-treatment Syptem in place
7045.0294 5	Are the required records (training, analytical results, inspection reports, ~~license renewal app~~, ~~exception reports~~, manifests) located at the ~~licensed~~ site and available for inspection?	IC	
7045.0568 1	Have emergency response arrangements been made with local authorities and outside providers? (fire, police, local hospital, emergency responders)	IC	
7045.0568 3	Has the Regulated Party documented in its operating record the arrangements made with local emergency authorities?	IC	No record
7045.0655 3, A	If there is an elementary neutralization unit, a pretreatment unit and/or waste water treatment unit, does the owner or operator conduct timely inspections of the unit(s) for malfunction, deterioration, operator error and discharges?	IC	
7045.0655 3, B	If there is an elementary neutralization unit, a pretreatment unit and/or waste water treatment unit, does the Regulated Party follow a written inspection schedule for inspection of all monitoring equipment, safety and emergency equipment, security devices and operating and structural equipment?	IC	
7045.0655 3, E	If there is an elementary neutralization unit, a pretreatment unit and/or waste water treatment unit, are all applicable inspection (and repair) records (logs) kept for at least 3 years and available on-site?	IC	
7045.0845	Does the Regulated Party properly manage used oil?	NC	labeling
7045.0895 4	Has used oil accepted from or given to another business to be burned for energy recovery been tested to determine that it is on-specification?	IC	

G1: General Management for Generators

Rule	Requirement	Compliance Status	Remarks
7045.0855 4, C	Does the Regulated Party keep records of every shipment of used oil leaving the generator site for at least three years?	IC	
7045.0805	Does the Regulated Party properly manage used oil-contaminated waste?	IC	
7045.0855 4, C	Does the Regulated Party keep records of every shipment of used oil-contaminated waste leaving the generator site for at least three years?	IC	
7045.0990	Is the Regulated Party properly managing used oil filters?	IC	
7045.0990 3, C, 3	Does the Regulated Party keep records of all used oil filters taken off-site by used oil-filter transporters for at least three years?	IC	

G1: Preparedness & Prevention

Rule	Requirement	Compliance Status	Remarks
7045.0566 2	Is hazardous waste managed to prevent or minimize releases?	IC	
7045.0566 3, A	Is a suitable alarm or communication system in place to provide emergency instructions to Regulated Party personnel?	IC	Alarm PA system
7045.0566 3, B	Is emergency communication equipment available to summon outside emergency responders?	IC	Alarm phones
7045.0566 3, C	Is fire control equipment, decontamination equipment, and spill control equipment available?	IC	

G1: Preparedness & Prevention			
Rule	**Requirement**	**Compliance Status**	**Remarks**
7045.0566 3, D	Is water available in adequate volume for fire control (i.e., firehose, sprinkler system and/or foam equipment) ?	IC	Check compatability w/ Acids + bases
7045.0566 4	Is emergency equipment tested and maintained?	IC	
7045.0566 5	Does the Regulated Party provide all personnel involved in hazardous waste being poured, mixed, spread, or otherwise handled with immediate access to an internal alarm or emergency communication device?	IC	
7045.0566 6	Is aisle space adequate for emergency operations (like fire fighting, spill cleanup, etc)?	IC	Stacked H. W. Containers on shelves
7060.0600 2	Has the Regulated Party discharged waste or pollutants to the unsaturated zone, through spills, dumping, sewering or other means?	NA	
7045.0275 2	If the Regulated Party had a release to the environment did the Regulated Party immediately notify the agency?	IC	Small release from delivery
7045.0275 3	If the Regulated Party has had a release, did the Regulated Party recover as rapidly and as thoroughly as possible, any HW that has leaked, spilled, or otherwise escaped a container?	IC	Product release
7045.0855 2, D	Upon detection of a release of used oil to the environment (not orginating from a UST) did the Regulated Party stop the release, contain the released used oil, clean up and manage properly the released used oil and other materials contaminated with used oil, and repair or replace any leaking used oil storage equipment prior to returning it to service to prevent future releases?	NA	

G1: Storage Requirements			
Rule	**Requirement**	**Compliance Status**	**Remarks**
7045.0292 1, F	Are hazardous waste containers ~~& tanks~~ properly labeled with the words "Hazardous Waste" and a description that clearly identifies their contents to employees and emergency personnel?	IC	
7045.0292 1, C	Are hazardous waste containers ~~and tanks~~ labeled with the waste accumulation start date and is it visible for inspection? OR Is the accumulation start date recorded in a clear and legible log for non-shipping containers or tanks?	NC	One container w/o date
7045.0292 1, A	Has the generator stored HW for more than 90 days beyond the waste accumulation start date?	NC	One container may be over 90 days
7045.0292 1, D	Are hazardous waste storage areas (outdoors) protected from unauthorized access and inadvertent damage from vehicles & equipment?	NA	None outdoors
7045.0292 1, E	Are hazardous waste containers that hold free liquid placed on an impermeable containment surface? If outdoors, is the surface curbed?	IC	
7045.0626 2, A	Are hazardous waste storage containers in good condition and leakproof?	IC	
7045.0626 2, B	Are there suitable leakproof covers for the hazardous waste containers?	NC	Not all satellite Containers w/ Covers
7045.0626 3	Are hazardous waste storage containers compatible with the waste stored in them?	IC	
7045.0626 4	Are hazardous waste storage containers closed? Are waste containers which can be degraded when exposed to moisture or sunlight covered by an overhead roof or other suitable covering that does not hide the labels?	NA	Missing Covers
7045.0626 5	Are weekly inspections of hazardous waste containers and their storage areas conducted AND documented?	IC	

G1: Storage Requirements			
Rule	**Requirement**	**Compliance Status**	**Remarks**
7045.0626 6	Are incompatible wastes adequately separated?	IC	
7045.0292 8, B,2	Are satellite accumulation containers properly labeled with "Hazardous Waste" and a clear description of their contents?	IC	
7045.0292 8, C,2	For satellite accumulation containers, if located away from the point of generation, are they inspected weekly, and are written records kept?	IC	
7045.0292 8, D,1	For satellite accumulation containers, is fill date marked on the containers?	IC	
7045.0292 8, D,2	For satellite accumulation containers, are they moved within 3 days of fill date to storage area?	IC	
7045.0855 2, C	If used oil is stored, is it stored in containers or tanks that are in good condition, stored on impermeable surfaces, kept closed, and labeled "Used Oil" (including tanks, containers and piping)?	NC	Not marked with words, "Used Oil"
7045.0855 2, C	Are wastes contaminated with used oil stored in containers or tanks that are in good condition, on impermeable surfaces, closed, and labeled "Used Oil" or "Used Oily Waste"?	NA	
7045.0990 3, A	If used oil filters are stored, are they stored in containers that are closed, leakproof and labeled "Used Oil Filters"?	NA	
273.14 (a)	Are universal waste batteries (each battery), or a battery storage container, labeled with: "Universal Waste-Battery(ies)," or "Waste Battery(ies)," or "Used Battery(ies)"?	NA	
273.13 (a)	Are universal waste batteries (lead acid, NiCad, etc) that show evidence of leakage, spillage, or damage stored in a closed, structurally sound, compatible container?	NA	

G1: Storage Requirements			
Rule	**Requirement**	**Compliance Status**	**Remarks**
273.14 (e)	Are containers of universal waste lamps labeled with: "Universal Waste-Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)"?	NE	None present
273.13 (d)	Are universal waste lamps stored in closed containers that are structurally sound, adequate to prevent breakage, and compatible? Do containers lack evidence of leakage, spillage, or damage?	NE	
273.13 (c)	Is mercury containing equipment stored in closed containers that are structurally sound, compatible with the contents of the device? Does the container lack evidence of leakage, spillage, or damage?	NA	No equipment
273.14 (d)	Is mercury containing equipment (i.e. each device) or a container in which the equipment in contained labeld with: "Universal Waste - Mercury Containing Equipment," "Waste Mercury-Containing Equipment," or "Used Mercury -Containing Equipment"?	NA	

G1: Manifests			
Rule	**Requirement**	**Compliance Status**	**Remarks**
7045.0261 1	Are shipments of hazardous waste made without using a manifest? (exceptions for VSQGs)	IC	Manifests avialable for three years and beyond
7045.0261 7	Do manifests contain ALL of the following?: Manifest document number, generator data, transporter data, facility data, waste data, required signatures & dates, and a 24 hour emergency number. (document problem manifests in remarks and Description of Violation)	IC	
7045.0265 1, D	Have copies of manifests signed by the generator and transporter been sent to the MPCA within five working days of the initial transporter's acceptance of the waste?	IC	
7045.0265 4, A	Have copies of manifests signed by the facility been sent to the MPCA within 40 days of the acceptance of the waste by the facility?	IC	

G1: Manifests			
Rule	**Requirement**	**Compliance Status**	**Remarks**
7045.0298	If applicable, has the generator submitted to the MPCA an exception report for manifest copies not received back from the TSDF within 45 days of the date the waste was initially shipped?	NA	
7045.0294 1	Are signed facility copies of manifests available for review for 3 years from the date material was accepted by the initial transporter?	IC	
7045.0302 1	If Regulated Party exports hazardous waste, are all applicable rules being complied with? (notification, consent, EPA acknowledgement of consent, shipping papers or manifests, etc)	NA	
G1: Land Disposal Restrictions			
Rule	**Requirement**	**Compliance Status**	**Remarks**
268.7 (a), (2)	For waste or contaminated soil that does not meet treatment standards, has the Regulated Party sent a one-time land disposal restriction notification to the receiving treatment or storage facility? Is a copy of the notification available at the Regulated Party's site? Have new notifications been sent when there are changes in waste streams and to any new receiving facilities?	IC	LDRs attached to some manifests + avialble at facility
G1: Personnel Training			
Rule	**Requirement**	**Compliance Status**	**Remarks**
7045.0558 1	Have employees that manage hazardous waste completed a hazardous waste training program?	IC	BA in Chemistry + 5 years experience
7045.0558 2	Does the Regulated Party have a hazardous waste program director trained in hazardous waste management procedures?	IC	
7045.0558 3	Does the training program include hazardous waste management and emergency response procedures relevant to the positions held by facility personnel?	NC	Exercises for emergency response not documented

G1: Personnel Training

Rule	Requirement	Compliance Status	Remarks
7045.0558 4	Are new employees trained in hazardous waste management within 6 months of hire or transfer?	NC	One employee → close to 6 months
7045.0558 5	Is refresher training regarding the management of hazardous waste provided at least once per calendar year?	IC	
7045.0558 6, A	Does the Regulated Party maintain training records which include a job title for each position at the facility related to hazardous waste?	IC	
7045.0558 6, B	Do the records include a job description for each position related to hazardous waste?	IC	
7045.0558 6, C	Is a written description of the type and amount of training (initial & continuing) documented for each position related to hazardous waste?	NC	Requires written description of training for 3 position related to H.W. management
7045.0558 6, D	Has the Regulated Party kept records that document that the initial training and annual review training has been given?	IC	
7045.0558 7	Have training records been maintained for lifetime of facility (or 3 years after an employee leaves.)?	NC	Nothing before 2009

G1: Contingency Plan

Rule	Requirement	Compliance Status	Remarks
7045.0572 2	Does the Regulated Party have a contingency plan?	IC	
7045.0574 1	Does the Regulated Party have an Emergency Coordinator on-site or on-call, and does s/he have authority to act (commit resources?)	IC	

G1: Contingency Plan			
Rule	**Requirement**	**Compliance Status**	**Remarks**
7045.0572 4, A	Does the contingency plan specify employees' emergency response actions?	IC	
7045.0572 4, C	Does the plan describe arrangements agreed to with local emergency responders?	IC	
7045.0572 4, D	Does the plan include up-to-date name, address and Home and Work phone numbers for emergency coordinators?	IC	
7045.0572 4, E	Does the contingency plan include an up-to-date emergency equipment list?	IC	
7045.0572 4, F	Is there an evacuation plan for employees that includes signals used to begin evacuation, and primary and alternate evacuation routes?	IC	Add assembly areas to map
7045.0572 5, A	Is a copy of the contingency plan maintained on-site?	IC	
7045.0572 5, B	Have copies of the contingency plan been submitted to local authorities and emergency response teams?	IC	No record.
7045.0572 6	Has the contingency plan been amended when necessary? (rule change, emerg.eqpt change, process change, emerg. coord. change, plan failed)	NC	Needs to add new response team members